

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Case No. 09-10243-MLW
	)	
v.	)	
	)	
RYAN HARRIS, a/k/a DerEngel,	)	
	)	
and	)	
	)	
TCNISO, INC.,	)	
Defendants	)	

GOVERNMENT'S MOTION TO WITHDRAW ARREST WARRANT

The Government asks the Court to withdraw the warrant that it issued yesterday for the arrest of Ryan Harris. The grounds for the motion are:

1. The government learned on Sunday, November 15, 2009, that airline manifest records showed that Harris was scheduled to fly out of the country at 1:10 p.m. PST yesterday (November 16, 2009) from LAX airport, on Singapore Airlines. The flight stopped in Tokyo, Japan and continued to Singapore.

2. This travel would have been in direct violation of Harris's conditions of release and is also the kind of flight about which the government was concerned at the time of Harris's arrest, leading the government to seek (unsuccessfully) Harris's detention. Harris's wife is a Chinese citizen and Harris has spent months at a time in China during the past several years.

3. In requesting a warrant, the government informed the Court that Oregon Pretrial Services officer Lisa Brown had told the government that, at the time he was interviewed by that department, Harris mentioned a previously scheduled trip to visit his wife's family in Hong Kong. He was told that he could not take that trip.

4. The government also told the court that it was possible that the flight manifest information reflected that previously-scheduled trip, and that Harris had since cancelled his reservation. But because he appeared on the flight manifest the day before the flight, there was a real possibility that he intended to leave the country, and the government therefore requested an arrest warrant, which the Court issued.

5. FBI agents were at LAX airport and prepared to arrest Harris yesterday afternoon. But although his name remained on the passenger list for the Singapore Airlines flight, he did not check in. The government has therefore concluded that this was likely his previously-scheduled trip and that he must not have cancelled his reservation.

The government therefore asks the Court to withdraw the arrest warrant.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

By: /s/ Adam Bookbinder  
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Department of Justice Trial Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Adam Bookbinder  
Adam Bookbinder

Dated: November 17, 2009